

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

DOUGLAS I. HORNSBY, Administrator of  
the Estate of CYNTHIA GARY,

Plaintiff,

vs.

UNITED STATES of AMERICA,

METRO MACHINE CORP., d/b/a  
GENERAL DYNAMICS NASSCO-  
NORFOLK,

HARBOR INDUSTRIAL SERVICES, INC.,

COASTAL MECHANICAL SYSTEMS,  
LLC,

ADVANCED INTEGRATED  
TECHNOLOGIES, LLC,

KD SHIPYARD REPAIRS, LLC,

And

CECO ENVIRONMENTAL CORP.,

Defendants.

**CIVIL ACTION NO. 2:22-CV-427**

**COASTAL MECHANICAL SYSTEMS, LLC'S  
MOTION FOR JUDGMENT ON THE PLEADINGS**

**NOW COMES** Defendant Coastal Mechanical Systems, LLC, ("Coastal") by and through undersigned counsel pursuant to Federal Rule of Civil Procedure 12(c), moves this Court for Judgement on the Pleadings to dismiss Court VIII asserted by Plaintiff Douglas I. Hornsby

Administrator of The Estate of Cynthia Gary in the Amended Complaint. The grounds for this Motion are set forth in a Memorandum in Support concurrently filed with this Motion.

Respectfully submitted this the 27<sup>th</sup> day of October, 2023.

**CRANFILL SUMNER LLP**

By: /s/ Jason R. Harris  
JASON R. HARRIS  
V.A. Bar No. 96594  
5535 Currituck Drive, Suite 210  
P.O. Box 1950  
Wilmington, NC 28402  
Telephone (910) 777- 6000  
Facsimile (910) 777 – 6111  
Email: [jharris@cshlaw.com](mailto:jharris@cshlaw.com)  
*Attorney for Defendant Coastal  
Mechanical Systems, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing document ***Coastal Mechanical Systems, LLC's Motion for Judgment on the Pleadings*** with the Clerk of the Court using CM/ECF system which will send notification of such filing to the following:

Robert John Haddad  
Andrew Mitchell Hendrick  
Ruloff Swain Haddad Morecock  
Talbert & Woodward, PC  
317 30<sup>th</sup> St.  
Virginia Beach, VA 23451  
[rhaddad@srgslaw.com](mailto:rhaddad@srgslaw.com)  
[ahendrick@srgslaw.com](mailto:ahendrick@srgslaw.com)  
Attorneys for Plaintiff

Edward J. Powers  
Dustin M. Paul  
Allison M. Mentch  
Woods Rogers Vandeventer Black  
101 West Main St., Suite 500  
Norfolk, VA 23510  
[Edward.Powers@wrvblaw.com](mailto:Edward.Powers@wrvblaw.com).  
[Dustin.Paul@wrvblaw.com](mailto:Dustin.Paul@wrvblaw.com)  
[Alli.Mentch@wrvblaw.com](mailto>Alli.Mentch@wrvblaw.com)  
Attorneys for Defendant, Advanced Integrated Technologies, LLC

James L. Chapman, IV  
Alexander R. McDaniel  
Crenshaw, Ware & Martin, P.L.C.  
150 W. Main Street, Suite 1923  
Norfolk, VA 23510  
[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)  
[amcdaniel@cwm-law.com](mailto:amcdaniel@cwm-law.com)  
Attorneys for Defendant KD Shipyard Repairs, LLC

Lynn K. Brugh, IV  
John A. Irvin  
Williams Mullen  
200 South 10<sup>th</sup> Street, Suite 1600  
Richmond, VA 23219  
[lbrugh@williamsmullen.com](mailto:lbrugh@williamsmullen.com)  
[jirvin@williamsmullen.com](mailto:jirvin@williamsmullen.com)  
Attorneys for Defendant Metro Machine Corp., d/b/a General Dynamics NASSCO-Norfolk

W. Benjamin Woody  
Harman, Claytor, Corrigan & Wellman  
1900 Duke Street, Suite 210  
Alexandria, VA 22314  
[bwoody@hccw.com](mailto:bwoody@hccw.com)  
Attorney for Defendant, CECO Environmental Corporation

Garry D. Hartlieb  
Malinda Robbin Lawrence  
Darren Earl Myers  
United States Department of Justice  
Civil Division  
175 N Street, NE  
Suite 8.129  
Washington, DC 20002  
[Garry.hartlieb@usdoj.gov](mailto:Garry.hartlieb@usdoj.gov)  
[Malinda.r.lawrence@usdoj.gov](mailto:Malinda.r.lawrence@usdoj.gov)  
[Darren.e.myers@usdoj.gov](mailto:Darren.e.myers@usdoj.gov)  
Attorneys for Defendant United States of America

This the 27<sup>th</sup> day of October, 2023.

CRANFILL SUMNER LLP

By: /s/ Jason R. Harris  
Jason R. Harris